

RINELL ELAINE WALDRON,

Plaintiff,

V.

KILOLO KIJAKAZI,
Acting Commissioner of Social Security,

Defendant.

Civil No. 2:22-cv-02237-CKD

**STIPULATION AND ORDER FOR
EXTENSION OF TIME TO RESPOND
TO PLAINTIFF'S COMPLAINT**

1 The parties stipulate through counsel that Defendant, the Acting Commissioner of Social Security
2 (the "Commissioner"), shall have an extension of time to respond to Plaintiff's Complaint in this case.

3 In support of this request, the Commissioner respectfully states as follows:

4 1. Defendant's response to Plaintiff's Complaint is due February 21, 2023. Defendant has
5 not previously requested an extension of this deadline.

6 2. The certified administrative record (CAR) in this case has not been finalized for filing.
7 The agency's Office of Appellate Operations (OAO) is responsible for preparation of CARs. Counsel
8 for the Commissioner is in contact with OAO to ensure that the CAR is properly certified for filing. OAO
9 has indicated it needs additional time to prepare the CAR, accordingly, Defendant requests an extension
10 of 60 days to respond to Plaintiff's Complaint.

11 3. Counsel for the Commissioner has consulted with Plaintiff's counsel who advised that
12 they have no objections.

13 4. This request is made in good faith and is not intended to delay the proceedings in this
14 matter.

15 WHEREFORE, Defendant requests until April 22, 2023, respond to Plaintiff's Complaint.

16 Respectfully submitted,

17
18 Date: February 22, 2023

19 By: /s/ Young Chul Cho *
20 Young Chul Cho
21 Law Offices of Lawrence D. Rohlfing
22 Attorneys for Plaintiff
23 *Authorized by email
24
25
26
27
28

1
2 Date: February 22, 2023

PHILIP A. TALBERT
United States Attorney
Eastern District of California

3
4 By: /s/ Oscar Gonzalez de Llano
5 OSCAR GONZALEZ de LLANO
6 Special Assistant United States Attorney
7 Attorneys for Defendant
8

9 ORDER

10 APPROVED AND SO ORDERED.
11

12 Dated: February 22, 2023

13 
14 CAROLYN K. DELANEY
15 UNITED STATES MAGISTRATE JUDGE
16
17
18
19
20
21
22
23
24
25
26
27
28